## Morgan Lewis

Michael F. Fleming

+1.212.309.6000 michael.fleming@morganlewis.com

March 16, 2021

## MEMO ENDORSED

## **Via ECF**

The Honorable Sidney H. Stein United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Romero v. Colgate-Palmolive Company, No. 1:20-cv-09216-SHS

Request to Extend Stay

Dear Judge Stein:

We represent defendant Colgate Palmolive Company ("Defendant") in the above-referenced action. Pursuant to Your Honor's Individual Practices, we write with the consent of counsel for Plaintiff Josue Romero ("Plaintiff"), to inform the Court that the parties have finalized the terms of their agreement to resolve this matter. To comply with those terms, counsel for Defendant respectfully requests that the Court stay all pending deadlines in this case for an additional 30 days to permit the parties to comply with the terms of their agreement and submit a stipulation of dismissal to the Court. If granted, Defendant's time to respond to the Complaint would be extended to April 15, 2021, and the Initial Conference scheduled for April 2, 2021 would be adjourned to a date and time after April 15, 2021 that is convenient to the Court. As noted above, Plaintiff's counsel consents to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

Attorney for Defendant

cc: All Counsel of Record (via ECF)

Defendant's time to respond to the complaint is extended to April 15, 2021. The initial conference is adjourned to April 16, 2021, at 10:00 a.m.

Dated: New York, New York March 16, 2021

> SIDNEY H. STEIN U.S.D.J.

SO ORDERED

Morgan, Lewis & Bockius LLP